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**PACIFIC**  **TELESIS**  
Group-Washington

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

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Donna R. Searcy  
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Federal Communications Commission  
Mail Stop 1170  
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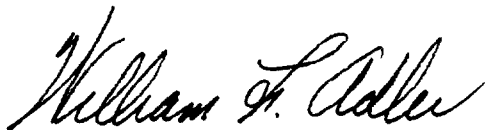
Dear Ms Searcy:

Re: *CC Docket No. 92-237, Phase II - Administration of the North American Numbering Plan*

On behalf of Pacific Telesis Group, PacTel Corporation, Pacific Bell, and Nevada Bell, please find enclosed an original and six copies of their "*Reply Comments*" in the above proceeding.

Please stamp and return the provided copy to confirm your receipt. Please contact me should you have any questions or require additional information concerning this matter.

Sincerely,



Enclosures

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JAN 27 1993

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20054

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of )  
 )  
Administration of the )  
North American Numbering Plan )  
\_\_\_\_\_ )

CC Docket No. 92-237  
Phase II

REPLY COMMENTS OF PACIFIC TELESIS GROUP

The Pacific Telesis Group, PacTel Corporation, Pacific Bell, and Nevada Bell ("The Pacific Companies") file these reply comments concerning expansion of Feature Group D CICs.

As many commenters noted, the expansion of Feature Group D CICs was fully addressed in the Industry Carriers' Compatibility Forum ("ICCF"). While various technical alternatives were examined in that forum, none were acceptable except for expansion to 101XXXX. The Pacific Companies support the industry decision to move forward with Feature Group D CIC expansion and are already well underway in carrying out the changes necessary to accommodate this new carrier access code. Thus, the action by the Commission should be limited to supporting the industry implementation plans for the expansion.

Some parties<sup>1</sup> have suggested that CIC codes be separated into those carriers who use it for customer access,

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<sup>1</sup>See, e.g. Comments of Intellicall.

versus those carriers that simply need a CIC code for billing and collection or other routing information. This alternative was examined in the ICCF, and subsequently rejected since there were no alternatives to using the CIC for billing and routing information. Further, if the use of the code determines whether or not one is assigned, the issue of who polices the use of that code surfaces. A LEC has no way of knowing the use to which the entity puts the CIC. Thus, this alternative is not viable.

Additionally, the Commission should grant exogenous cost treatment for the costs incurred to expand Feature Group D CICs. As the Pacific Companies noted in its comments, the requirement to expand Feature Group D CICs is grounded in the MFJ requirement that carriers be given access codes with the same number of digits as customers use to access AT&T. Further, the Commission's decision to allow end users to purchase through the access tariffs also hastened the exhaustion of this resource.

Finally, Pacific requests that the Commission endorse the 18-month permissive dialing period so that customers have an opportunity to learn the new access code dialing. Pacific does not support having a disparate dialing pattern where some customers use a 5-digit access code and others use a 7-digit code. Moreover, the Pacific Companies experience significant software impacts in switches to translate both 10XXX and 101XXXX dialing. Therefore, the Pacific Companies endorse the 18-month

permissive dialing period suggested by the North American  
Numbering Plan administrator.

Respectfully submitted,

PACIFIC TELESIS GROUP  
PACTEL CORPORATION  
PACIFIC BELL  
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Date: January 26, 1993

CERTIFICATE OF SERVICE

I, Alex Kositsky, certify that the following is true and correct:

I am a citizen of the United States, State of California and over eighteen years of age.

My business address is 140 New Montgomery Street, San Francisco, CA 94105.

On January 27, 1993, I served the attached "Pacific Telesis' Reply Comments on Phase II, Notice of Inquiry in the Matter of the North American Numbering Plan - CC Docket No. 92-237" by placing true copies thereof in envelopes addressed to the parties in the attached list, which envelopes, with postage thereon fully prepaid, I then sealed and deposited in a mailbox regularly maintained by the United States Government in the City and County of San Francisco, State of California.

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By: \_\_\_\_\_

  
Alex Kositsky

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